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June 6, 2008

VIA FACSIMILE & OVERNIGHT COURIER

The Honorable Charles L. Brieant
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas St., Room 275
White Plains, NY 10601

Re: Koninklijke Philips Electronics N.V. v. Cinram
International Inc. (08-cv-515 (CLB))

Your Honor:

We represent the Philips Plaintiffs in the above-captioned matter and write in response to the June 3, 2008 letter from Defendants' counsel.

Philips joins in Defendants' request to hold a case management conference on June 13, 2008, and also requests a pre-motion conference on June 13, 2008, in place of the hearing on motions scheduled to be heard that day, which the parties stipulated on June 3 to take off calendar.

The issues that Philips wishes to raise at the proposed June 13 case management conference are as follows:

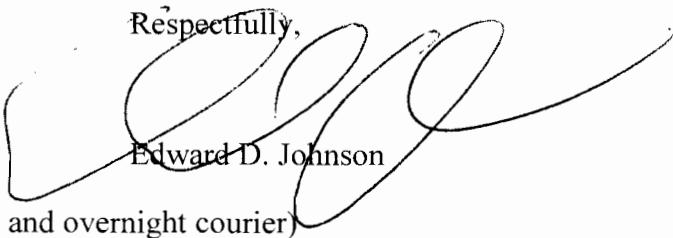
1. coordinating this action with *Philips v. ADS et al.* (08-cv-4068) (currently before Your Honor), and with *Philips v. EDC et al.* (08-cv-4070) (currently before Judge Robinson) and *Philips v. OEM et al.* (08-cv-4071) (currently before Judge Karas);
2. a pre-motion conference regarding: (a) the Cinram defendants' failure to produce any documents concerning their manufacturing techniques and CD structures; (b) Cinram's refusal to disclose whether they intend to assert opinion of counsel as a defense to willful infringement and their corresponding refusal to produce documents relating to those opinions; and (c) the refusal of Cinram's counsel to produce highly relevant, non-privileged subpoenaed documents relating to the patent-in-suit.
3. the following dates, which were set forth in the parties' Supplemental Fed. R. Civ. P. 26(f) Report and Stipulated Scheduling Order filed April 2, 2008 (Dkt. 17), and incorporated into the Court's April 1, 2008 Civil Case Discovery Plan and Scheduling Order (Dkt. 19):

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- a. claims construction hearing relating to the patent-in-suit: on or about September 17, 2008;
- b. discovery status conference: January 19, 2009;
- c. trial ready date: April 20, 2009.

Philips will be prepared to discuss the other issues raised in Defendants' June 3 letter as well. The parties hope to resolve some of their issues before the case management conference.

Respectfully,



Edward D. Johnson

cc: Ivan Kavrukov, Esq. (via facsimile and overnight courier)